



A Guide to Packaging Audits and Reduction Workplans

As Required Under Ontario Regulation 104/94.

To be used in conjunction with the guidelines on
Packaging Audit and Packaging Reduction Workplans
published June 1992 by the Canadian Council of
Ministers of the Environment (CCME).



Ontario

Ministry of Environment and Energy

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The ministry welcomes comments on the guides. Please submit them to the above address.

Questions regarding the regulations should be directed to the ministry's Waste Reduction Office in Toronto at (416) 325-4440, or to a Ministry of Environment and Energy Regional or District Office listed in Appendix A.

Copies of Regulation 104/94 are available from Publications Ontario at 1-800-668-9938 or 326-5300 in Toronto.

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PREFACE

This guide is one of a series to help waste generators, packagers, municipalities and recycling site operators understand and comply with the requirements of the 3Rs Regulations that became law March 3, 1994.

The regulations are an integral part of Ontario's Waste Reduction Action Plan, announced in February 1991 by the Minister of Environment and Energy. The plan is aimed at reducing the amount of waste going to disposal by at least 50 per cent by the year 2000 compared to the base year of 1987.

Ontario will achieve this goal with a strategy based on the 3Rs - reduction, reuse and recycling.

The 3Rs Regulations are designed to ensure that industrial, commercial and institutional (IC&I) sectors, as well as municipalities, develop programs to reduce the amount of valuable resources going to disposal.

The five new regulations, made under the *Environmental Protection Act*, are:

Ontario Regulation 101/94: Recycling and Composting of Municipal
Waste

Ontario Regulation 102/94: Waste Audits and Waste Reduction Workplans

Ontario Regulation 103/94: Industrial, Commercial and Institutional
Source Separation Programs

Ontario Regulation 104/94: Packaging Audits and Packaging Reduction
Workplans

Ontario Regulation 105/94: Definitions (Amendments to Regulation 347)

This guide will help designated packaging users comply with the requirements for conducting packaging audits and preparing and implementing packaging reduction workplans as required under Regulation 104/94. For a legal interpretation of requirements, refer to the Official Regulation.

The other guides in this series are:

- *A Guide to Source Separation of Recyclable Materials and Leaf and Yard Waste Systems for Municipalities as Required under Ontario Regulation 101/94*
- *A Guide to Source Separation of Recyclable Materials for Industrial, Commercial and Institutional Sectors and Multi-Unit Residential Buildings as Required under Ontario Regulation 103/94*
- *A Guide to Approvals for Recycling Sites, Leaf and Yard Waste Composting Sites and Compost Use as Required under Ontario Regulation 101/94*
- *A Guide to Waste Audits and Reduction Workplans for Construction and Demolition Projects as Required under Ontario Regulation 102/94*
- *A Guide to Waste Audits and Reduction Workplans for Industrial, Commercial and Institutional Sectors as Required under Ontario Regulation 102/94*

Ontario's Waste Reduction Target

The Government of Ontario has established a target to decrease the amount of waste going to disposal by at least 50 per cent by the year 2000 compared to the base year of 1987. This is a *provincial* target that applies to the total amount of non-hazardous solid waste generated in Ontario from all sources. While this target is not a legal requirement for individual municipalities and IC&I establishments under the 3Rs Regulations, many have voluntarily adopted it, and some have set an even higher waste reduction target.

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1.0

INTRODUCTION

This guide summarizes the provisions of Ontario Regulation 104/94 that apply to packaging users. It is to be used in conjunction with the guideline entitled *Packaging Audits and Packaging Reduction Workplans* published by the Canadian Council of Ministers of the Environment (CCME). The CCME document, included at the end of this guide, contains guidelines to help industries across Canada to meet the goals of the National Packaging Protocol.

Under the National Packaging Protocol, the year 1988 has been chosen as the base year for determining waste reduction progress. Regulation 104/94 allows any year to be used to measure progress.

1.1 Compliance Deadlines

All designated establishments have six months from the date they become subject to the regulation to complete a packaging audit and reduction workplan:

- September 3, 1994, if an existing establishment was above the size threshold on the day the regulation became law.
- Six months from the date a future establishment comes into existence, if it is above the size threshold.
- Six months from the date an existing establishment exceeds the size threshold.

2.0

GENERAL REQUIREMENTS

A packaging reduction program required under Regulation 104/94 has two basic components: a packaging audit and a packaging reduction workplan. This section outlines the general requirements for these components.

2.1 Conducting a Packaging Audit

A packaging audit provides information about the types and volumes of packaging being used.

An audit shall address: (a) the type and amount of the packaging; (b) the amount of reused or recycled materials being used; (c) the management decisions and policies affecting packaging; (d) the reusability and recyclability of the packaging after use; and (e) the final destination and its impact on that waste stream.

2.2 Developing a Packaging Reduction Workplan

The second part of the program — the packaging reduction workplan — makes use of information obtained by the audit. A completed workplan reflects actions needed to reduce packaging.

A workplan shall address: (a) reducing the amount of packaging used; (b) increasing the amount of reused or recycled materials used in packaging; (c) increasing the reusability and recyclability of packaging after use; and (d) reducing the amount of waste packaging at final destination.

2.3 Processing and Reporting Requirements

Under the regulation, the process of preparing and implementing a packaging audit/reduction workplan must ensure that the following actions and considerations are complied with:

- A report of a packaging audit or a packaging reduction workplan must be on a form provided by the ministry (or another form in the same format or on the forms in the CCME Guidelines). The ministry forms are included at the end of this guide; additional forms are available from the ministry's Regional and District Offices.

- A packaging reduction workplan must state who is responsible for each part of the plan, when each part will be implemented and what the expected results are.
- A workplan must follow the 3Rs hierarchy and look at reduction as the first priority, followed by reuse and then recycling.
- If requested by the ministry Director, the most recent report and plan must be submitted to the Director within seven days.
- Within every two year period of the initial packaging audit and packaging reduction workplan, the establishment must update the audit and prepare an updated written report and plan.
- Those designated must implement the updated packaging reduction workplan.
- The packaging reduction workplan must include measures for communicating the plan to the employees. The workplan or a summary of it must be posted in places where most employees will see it. Any employee must be allowed to look at the complete workplan on request.

3.0

WHO IS AFFECTED

Two groups of packaging users are identified in the regulation as being required to conduct packaging audits and workplans:

- Establishments where packaged products in the following categories are manufactured or packaged:
 - food or beverage products
 - products made primarily of paper or wood fibre including packaged paper but not including printed materials
 - chemical products including packaged chemicals

The Standard Industrial Classification (SIC) system issued by Statistics Canada is a useful framework to help determine if a manufacturing establishment is subject to this regulation. Appendix B lists industries from Division E (Groups 10, 11, 27 and 37) of the SIC which are considered manufacturing establishments for purposes of this regulation. The mining, forestry, agricultural and crude petroleum and gas industries are not included.

- Importers who import any of the above packaged products for sale in Ontario.

3.1 *Large Manufacturing or Packaging Establishments*

A "large manufacturing establishment" is designated if employees at the site work in excess of 16,000 hours in total in any one month during the preceding two calendar years.

For example:

- For sites in operation when the regulation came into force, the employees at the site must have worked more than 16,000 hours in any month in 1992 or 1993 for the regulation to apply.
- For sites in operation after the regulation came into force, the regulation will apply in the first calendar year following a month in which employees work more than 16,000 hours.

Once the regulation applies to the owner of an establishment, the regulation will continue to apply unless two calendar years pass in which the total number of hours worked in all months is less than 16,000 hours.

An owner of this type of site is subject to the regulation, regardless of hours worked, if the owner is unable, within seven days of a request from the Director, to provide evidence that workers worked less than 16,000 hours during each of the two calendar years preceding the request. Copies of the records related to hours of employment under Section 11 of the *Employment Standards Act* are sufficient evidence.

An "owner" is the operator of the manufacturing establishment; not a landlord from whom the manufacturer may be leasing facilities.

A "site" includes nearby properties owned or leased by the same person where passage from one property to another involves crossing, but not travelling along, a public highway. This means all facilities or buildings at the same site are included in the calculation of hours worked.

3.2 Importers

An "importer" is designated as a person who imports packaged products (food or beverage, paper, or chemical) into Ontario for sale, and the value of the goods imported in any of the previous two calendar years was at least \$20 million. (Importers that do not sell in Ontario are not subject to the regulation.)

- The regulation will continue to apply for the two years following the last calendar year in which the value of goods was at least \$20 million.
- An importer is subject to the regulation, regardless of the value of goods imported, if unable, within seven days of a request from the Director, to provide evidence that the value of the goods imported into Ontario by the importer was less than \$20 million during the two calendar years preceding the request.
- Copies of purchase and sales records maintained under Section 40 of the *Customs Act* (Canada) or under Section 16 of the *Retail Sales Tax Act* are sufficient evidence of the value of the goods imported into Ontario.

4.0

SPECIAL PROVISIONS

The requirement to prepare packaging audits and reduction workplans applies only to persons who are designated in the regulations. All associated administrative, warehousing or other ancillary activities/departments located on site are considered to be included.

This section outlines special provisions for the affected establishments.

4.1 *Food, Beverage, Paper and Chemical Manufacturing or Packaging Establishments*

- The packaging audit and packaging reduction workplan must cover the packaging of the designated products manufactured or packaged at the site.
- In preparing the packaging reduction workplan, an owner who manufactures or packages a brand name product controlled by another person, must seek the co-operation of the person in control of the brand name.
- The workplan must include the names of the persons from whom co-operation was sought and a description of the co-operation obtained.

4.2 *Importers*

- The packaging audit and packaging reduction workplan must cover the packaging of the designated products imported and sold.
- The preparation of the packaging reduction workplan must include consideration of changing buying policies and the co-operation of the persons from whom the importer buys products.
- The workplan must include the names of the persons from whom the importer sought co-operation and a description of the co-operation obtained.

PACKAGING AUDIT WORKSHEET

Current Year:

Base Year or Previous Year:

Company Name:

Package Description:

Packaging Units in Base or Previous Year:

Packaging Units in Current Year:

Adjustment Factor:

[illegible]

Comments:

PACKAGING REDUCTION WORKPLAN SUMMARY SHEET

Current Year:

For Period:

Company Name:

Number of Packaging Workplan Worksheets Attached: ...

Packaging Material	Code	Weight Reduced (Tonnes)	Weight Reused (Tonnes)	Recycling Rate (%)	Recycled Content (%)
Total					

PACKAGING REDUCTION WORKPLAN SUMMARY INSTRUCTIONS

Name of Company, Current year, period - write the name of your company, the calendar year in which the audit was conducted, and the period covered by the audit.

Packaging material, Code - write down the type of material used and its NAPP code (you can find the NAPP codes in Appendix A of the CCME's *Packaging Audits and Workplans* attached to you packaging workplan guide).

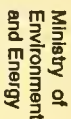
Weight Reduced - total amount of waste reduced (transferred from Worksheet A).

Weight Reused - total amount of waste reused (transferred from Worksheet B).

Recycling rate - total recycling rate (transferred from Worksheet C).

Percentage of Recycled content - total percentage of recycled content (transferred from Worksheet D).

Have an authorized official of your company sign and date this worksheet, stating his or her title.



Packaging Reduction Workplan Summary

As required by Ontario Regulation 104

Ontario

Name of company	Name of contact person	Telephone No.	Current Year	For period
				to

[illegible]

I hereby certify that the information provided is complete and correct, and the establishment complies with all the requirements of Regulation 104.

Signature of authorized official

Title

Date _____

PACKAGING REDUCTION WORKPLAN WORKSHEET INSTRUCTIONS

Name of Company, Current year, period - write the name of your company, the calendar year in which the audit was conducted, and the period covered by the audit.

Packaging material, Code - write down the type of material used and its NAPP code (you can find the NAPP codes in Appendix A of the CCME's *Packaging Audits and Workplans* attached to your packaging workplan guide).

Weight of material in the current year (A) and Weight of reuse in current year (B) - fill in the weight of the material you currently have.

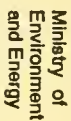
Recycling rate in current year (C) and Recycled Content in current year (D) - fill in the percentage.

Action - briefly describe what action you intend to take to minimize the amount of this material that ends up as waste disposal.

Planned Reduction (A), New Weight Reused (B), New Recycling Rate (C) and New Recycled Content (D) - fill in the potential reduction in each category.

Fill in the implementation date or anticipated implementation date for your waste reduction action on this material.

Have an authorized official of your company sign and date this worksheet, stating his or her title.



Packaging Reduction Workplan Summary

As required by Ontario Regulation 104

Ontario

Name of company	Name of contact person	Telephone No.	Current Year	For period to

[illegible]

I hereby certify that the information provided is complete and correct, and the establishment complies with all the requirements of Regulation 104.

Signature of authorized official

Title

Date _____

PACKAGING REDUCTION WORKPLAN WORKSHEET INSTRUCTIONS

Name of Company, Current year, period - write the name of your company, the calendar year in which the audit was conducted, and the period covered by the audit.

Packaging material, Code - write down the type of material used and its NAPP code (you can find the NAPP codes in Appendix A of the CCME's *Packaging Audits and Workplans* attached to your packaging workplan guide).

Weight of material in the current year (A) and Weight of reuse in current year (B) - fill in the weight of the material you currently have.

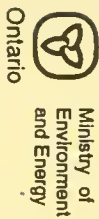
Recycling rate in current year (C) and Recycled Content in current year (D) - fill in the percentage.

Action - briefly describe what action you intend to take to minimize the amount of this material that ends up as waste disposal.

Planned Reduction (A), New Weight Reused (B), New Recycling Rate (C) and New Recycled Content (D) - fill in the potential reduction in each category.

Fill in the **implementation date** or **anticipated implementation date** for your waste reduction action on this material.

Have an authorized official of your company **sign and date** this worksheet, stating his or her title.



Packaging Reduction Worksheet D

Name of company	Name of contact person	Telephone No.	Current year	For period
				to

[illegible]

I hereby certify that the information provided is complete and correct, and the establishment complies with all the requirements of Regulation 104.

Signature of authorized official

Title

Date _____

PACKAGING REDUCTION WORKPLAN WORKSHEET INSTRUCTIONS

Name of Company, Current year, period - write the name of your company, the calendar year in which the audit was conducted, and the period covered by the audit.

Packaging material, Code - write down the type of material used and its NAPP code (you can find the NAPP codes in Appendix A of the CCME's *Packaging Audits and Workplans* attached to you packaging workplan guide).

Weight of material in the current year (A) and Weight of reuse in current year (B) - fill in the weight of the material you currently have.

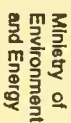
Recycling rate in current year (C) and Recycled Content in current year (D) - fill in the percentage.

Action - briefly describe what action you intend to take to minimize the amount of this material that ends up as waste disposal.

Planned Reduction (A), New Weight Reused (B), New Recycling Rate (C) and New Recycled Content (D) - fill in the potential reduction in each category.

Fill in the **implementation date** or **anticipated implementation date** for your waste reduction action on this material.

Have an authorized official of your company **sign and date** this worksheet, stating his or her title.



As required by Ontario Regulation 104

Name of company

Name of contact person

Telephone No.

Current year

For period

10

[illegible]

I hereby certify that the information provided is complete and correct, and the establishment complies with all the requirements of Regulation 104.

Signature of authorized official

Title

Date _____

PACKAGING REDUCTION WORKPLAN WORKSHEET INSTRUCTIONS

Name of Company, Current year, period - write the name of your company, the calendar year in which the audit was conducted, and the period covered by the audit.

Packaging material, Code - write down the type of material used and its NAPP code (you can find the NAPP codes in Appendix A of the CCME's *Packaging Audits and Workplans* attached to you packaging workplan guide).

Weight of material in the current year (A) and Weight of reuse in current year (B) - fill in the weight of the material you currently have.

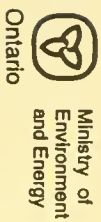
Recycling rate in current year (C) and Recycled Content in current year (D) - fill in the percentage.

Action - briefly describe what action you intend to take to minimize the amount of this material that ends up as waste disposal.

Planned Reduction (A), New Weight Reused (B), New Recycling Rate (C) and New Recycled Content (D) - fill in the potential reduction in each category.

Fill in the **implementation date** or **anticipated implementation date** for your waste reduction action on this material.

Have an authorized official of your company **sign and date** this worksheet, stating his or her title.



Packaging Reduction Workplan Worksheet B

As required by Ontario Regulation 104

Name of company	Name of contact person	Telephone No.	Current year	For period
				to

[illegible]

I hereby certify that the information provided is complete and correct, and the establishment complies with all the requirements of Regulation 104.

Signature of authorized official

Tide

Date _____

PACKAGING REDUCTION WORKPLAN WORKSHEET INSTRUCTIONS

Name of Company, Current year, period - write the name of your company, the calendar year in which the audit was conducted, and the period covered by the audit.

Packaging material, Code - write down the type of material used and its NAPP code (you can find the NAPP codes in Appendix A of the CCME's *Packaging Audits and Workplans* attached to your packaging workplan guide).

Weight of material in the current year (A) and Weight of reuse in current year (B) - fill in the weight of the material you currently have.

Recycling rate in current year (C) and Recycled Content in current year (D) - fill in the percentage.

Action - briefly describe what action you intend to take to minimize the amount of this material that ends up as waste disposal.

Planned Reduction (A), New Weight Reused (B), New Recycling Rate (C) and New Recycled Content (D) - fill in the potential reduction in each category.

Fill in the **implementation date** or **anticipated implementation date** for your waste reduction action on this material.

Have an authorized official of your company sign and date this worksheet, stating his or her title.



Ontario

Packaging Reduction Worksheet A

As required by Ontario Regulation 104

As required by Ontario Regulation 104

Name of company	Name of contact person	Telephone No.	Current year	For period to

Packaging material	Code	Weight of material used in current year (tonnes)	Action	Planned reduction (tonnes)	Date to be implemented
Total					

I hereby certify that the information provided is complete and correct, and the establishment complies with all the requirements of Regulation 104.

Signature of authorized official

Tide

Date _____

PACKAGING AUDIT SUMMARY INSTRUCTIONS

Name of Company - write the name of your company or institution in the space provided.

Current year - write the current calendar year the audit was performed in.

Base year - any year previous to the calendar year the audit was performed in for which you have adequate packaging use data.

Packaging material category - write down the type of material used, and its NAPP code (you can find the NAPP codes in Appendix A of the CCME's *Waste Audits and Workplans* attached to your packaging audits guide). Make sure all weights under the "Weight of new materials used" and "Weight of reused material" are in tonnes.

Base or previous year and Current year - enter the amount of new or reused material used in this packaging component, depending on the column.

Adjusted weight - multiply the weight of new material by your Adjustment Factor and write it in this column. Your Adjustment Factor can be found by dividing your overall base year production or distribution by the overall current year production or distribution.

Recycling rate - must be based on an established recycling system and must represent that portion of the total packages produced that is likely to be recycled. Companies claiming these rates must be able to support their claim if requested.

Recycled content - report the percentage of recycled content in each packaging component for the base or previous year and the current year.

Have an authorized official of your company sign and date this summary, stating his or her title.

[illegible]

10

PACKAGING REDUCTION WORKPLAN WORKSHEET

Current Year:

For Period:

Company Name:

RECYCLED CONTENT					
Packaging Material	Code	Recycled Content in Current Year	Action	New Recycled Content	Date to be Implemented
		Tonnes		Tonnes	
Total					

Comments:

For Period:

Current Year:

Company Name:

RECYCLING						
Packaging Material	Recycling Rate in Current Year		Action to Improve Recyclability or Recycling Rate	New Recycling Rate - If Known		Date to be Implemented
	Code	Tonnes			Tonnes	
	</					

Comments:

